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Attorneys for Plaintiff
Joseph Perez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH PEREZ, an individual ,

Plaintiff,

vs.

CHARLES DANIELS, et al.,

Defendants.

Case No. 2:21-cv-02061-CDS-VCF

**STIPULATION AND ORDER FOR
CONTINUANCE OF EARLY MEDIATION
CONFERENCE**

STIPULATION AND ORDER TO RESCHEDULE EARLY MEDIATION CONFERENCE

Pursuant to Local Rule 7-1, Plaintiff Joseph Perez (“Perez”) and Interested Party Nevada Department of Corrections (NDOC), by and through their respective counsels of record, do hereby stipulate and agree to the following:

1. On November 17, 2021, Perez, acting pro se, filed the Complaint. [ECF No. 1-1.]
2. That same day, Perez filed a Motion for Order Appointing Counsel. [ECF No. 1-2.]
3. On April 7, 2022, Perez filed his First Amended Complaint, again doing so pro se. [ECF No. 6.]
4. On July 19, 2022, this Court referred this case to the Inmate Early Mediation Program and set the date for the mediation for September 30, 2022, at 1:00 p.m. [ECF No. 15.]

5. One week later, this Court referred this case to the Federal Pro Bono Program. [ECF No. 17.]

6. BAILEY ❖ KENNEDY was recently contacted by the Pro Bono Program and agreed to offer their services as counsel for Perez in this matter.

7. BAILEY ❖ KENNEDY is in the process of obtaining Perez's formal consent to represent him in this matter.

8. Because of BAILEY ❖ KENNEDY's recent appointment, more time is needed to consult with Perez and acquire greater familiarity with the facts of this case and the legal issues at stake.

9. Accordingly, the Parties hereby stipulate to at least a 60-day continuance of the Inmate Early Mediation Conference and request that it be rescheduled for, Friday, December 2, 2022, or at the Court's and the mediator's earliest convenience thereafter.

DATED this 28th day of September, 2022.

BAILEY ❖ KENNEDY

By: /s/ Sarah E. Harmon

JOHN R. BAILEY
SARAH E. HARMON
TAYLER D. BINGHAM

*Attorneys for Plaintiff
Joseph Perez*

DATED this 28th day of September, 2022.

OFFICE OF THE ATTORNEY GENERAL

By: /s/ Chris W. Davis

AARON D. FORD
CHRIS W. DAVIS

*Attorneys for Interested Party Nevada
Department of Corrections*

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: September 29, 2022